UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

This document relates to: County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al. Case No. 1:18-OP-45090

The County of Cuyahoga v. Purdue Pharma L.P., et al.
Case No. 17-OP-45004

MDL NO. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DEFENDANTS' EMERGENCY MOTION TO RECONSIDER ORDERS SETTING EXPERT DISCOVERY SCHEDULE

For the reasons set forth in the accompanying Memorandum of Law, Defendants respectfully request that the Court order Plaintiffs to produce all underlying reliance materials for all experts immediately and, in any event, not later than Friday April 19, 2019, and amend CMO 8 to extend the deadline to complete depositions of Plaintiffs' experts to at least May 31, 2019. Defendants further respectfully request that the deadline for the disclosure of their experts be extended to July 1, 2019, that the date for completing depositions of Defendants' experts be extended to September 2, 2019, and that the deadline for submitting *Daubert* and dispositive motions be extended to October 15, 2019. Defendants also respectfully request that the Court order the expert depositions to continue day-to-day to ensure that all Defendants have an actual (as opposed to theoretical) right to question Plaintiffs' experts about any opinions specific to them.

Dated: April 15, 2019

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of April 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

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